

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

[REDACTED] (1)
[REDACTED] (2),
[REDACTED] (3)
FNU LNU, a/k/a "Primo" (4)
[REDACTED]
[REDACTED] (5)
[REDACTED],
[REDACTED] (6)

§ **SEALED**
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§ NO. 4:14CR173
§ Judge Crone
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SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846 (Conspiracy
to Distribute and Possess with the Intent
to Distribute Cocaine)

That from sometime in or about June 2013 up to and including the date of this
superseding indictment, in the Eastern District of Texas and elsewhere, [REDACTED]
[REDACTED], [REDACTED], [REDACTED], [REDACTED], "FNU LNU,
a/k/a "Primo," [REDACTED] and [REDACTED],
[REDACTED] defendants, did knowingly and intentionally combine, conspire, and
agree with each other and other persons known and unknown to the United States Grand

Jury, to knowingly and intentionally distribute and possess with the intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

Count Two

Violation: 21 U.S.C. § 846 (Attempted Possession with Intent to Distribute a Controlled Substance)

On or about July 23, 2014, in the Eastern District of Texas, defendants [REDACTED] and [REDACTED] did knowingly and intentionally attempt to possess with intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

In violation of 21 U.S.C. § 846.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE
Criminal Forfeiture Pursuant to 18 U.S.C. § 982

As a result of committing the offenses charged in this Indictment, the defendants herein may have used or intended to use property to commit or facilitate the offenses and/or property derived from proceeds obtained directly or indirectly as a result of the commission of the violation of 21 U.S.C. § 846.

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL

GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY

JAY R. COMBS
Assistant United States Attorney

Date

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NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. § 846 - Conspiracy

Penalty: If five kilograms or more of a mixture or substance containing a detectable amount of cocaine -- not less than 10 years nor more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00

Count Two

Violation: 21 U.S.C. § 846 - Attempt

Penalty: If five kilograms or more of a mixture or substance containing a detectable amount of cocaine -- not less than 10 years nor more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00